



FAIR POLITICAL PRACTICES COMMISSION

428 J Street • Suite 620 • Sacramento, CA 95814-2329

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October 1, 2010

Mr. Santiago Jackson

REDACTED

Advisory Letter Re: FPPC No. 10/822, Santiago Jackson

Dear Mr. Jackson:

As you may know, the Enforcement Division of the Fair Political Practices Commission (the "FPPC") has received a complaint against you. The complaint against you alleged that, as a lobbyist, you may have failed to comply with your required reporting obligations. Specifically, the Secretary of State indicated that you failed to file a Form 615 for the time period covering October 1, 2009 through December 31, 2009. After review of the complaint, the Enforcement Division has decided to close its file on this matter without initiating an enforcement action. The basis for this decision is as follows.

The FPPC enforces the provisions of the Political Reform Act (the "Act"),¹ found in Government Code Section 81000, et seq. Section 86113 of the Act provides that lobbyists must file periodic reports. Section 82039 of the Act defines a lobbyist as "any individual who receives two thousand dollars (\$2,000) or more in economic consideration in a calendar month, other than reimbursement for reasonable travel expenses, or whose principal duties as an employee are, to communicate directly or through his or her agents with any elective state official, agency official, or legislative official for the purpose of influencing legislative or administrative action."

Los Angeles Unified School District (LAUSD) triggered your filing obligation when it filed termination paperwork indicating that you intended to continue as a lobbyist. However, LAUSD's indication was incorrect because you did not intend to continue lobbying. Therefore, you are not in violation of the Act because you were not required to file.

¹ The Political Reform Act is contained in Government Code sections 81000 through 91014. All statutory references are to the Government Code, unless otherwise indicated. The regulations of the Fair Political Practices Commission are contained in sections 18110 through 18997 of Title 2 of the California Code of Regulations. All regulatory references are to Title 2, Division 6 of the California Code of Regulations, unless otherwise indicated.

You submitted a Form 615 for the time period covering October 1, 2009 through December 13, 2009 on September 7, 2010. However, the FPPC is closing its case with this advisory letter because your former lobbyist employer incorrectly indicated your need to file.

Your cooperation in ensuring that the requirements of the Act are consistently satisfied is greatly appreciated. If you have any questions regarding this matter, please contact Jennifer Reimer at 916-322-8222.

Sincerely,

REDACTED 

← Gary S. Winuk, Chief
Enforcement Division

cc: Gloria Gilmore
Political Reform Division
California Secretary of State

GSW/jr